

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

IN RE: RANBAXY GENERIC DRUG  
APPLICATION ANTITRUST  
LITIGATION

MDL No. 2878

THIS DOCUMENT RELATES TO:

All Direct Purchaser Actions

Master File No.  
19-md-02878-NMG

**DIRECT PURCHASER PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY  
APPROVAL OF PROPOSED SETTLEMENT, APPROVAL OF THE FORM AND  
MANNER OF NOTICE, APPOINTMENT OF SETTLEMENT ADMINISTRATOR  
AND ESCROW AGENT, AND SETTING THE FINAL SETTLEMENT SCHEDULE  
AND DATE FOR FAIRNESS HEARING**

Pursuant to Federal Rule of Civil Procedure 23(e), plaintiffs Meijer, Inc. and Meijer Distribution, Inc. ("Plaintiffs") on behalf of themselves and the classes of direct purchasers previously certified by this Court (the "Direct Purchaser Classes" or "Classes"), move for entry of an Order:

1. Granting preliminary approval of the agreement by and between Plaintiffs, individually and on behalf of the Direct Purchaser Classes, with defendants Ranbaxy, Inc. and Sun Pharmaceutical Industries Limited ("Defendants" or "Ranbaxy") to settle the claims brought on behalf of the Direct Purchaser Classes against Ranbaxy in this action (the "Settlement Agreement");
2. Approving the proposed form and manner of notice of the proposed settlement to members of the Direct Purchaser Classes;
3. Appointing Rust Consulting, Inc. as settlement administrator to assist in disseminating settlement notice to the Direct Purchaser Classes, and, if the settlement is

granted final approval, sending claim forms, processing and validating responses, and distributing each class member's share of settlement funds.

4. Appointing The Huntington National Bank as escrow agent to receive and invest the settlement funds in accordance with the terms of the Escrow Agreement; and

5. Setting a schedule for the final approval process, including the date for a Fairness Hearing.

In support of this motion, Plaintiffs submit that the proposed settlement is fair, reasonable, and adequate, providing a gross cash payment to the Direct Purchaser Classes of \$340 million in exchange for releases to Ranbaxy (as set forth in the Settlement Agreement), and that the proposed form and manner of notice will adequately inform the Direct Purchaser Classes of the terms of the settlement.

Dated: April 22, 2022

Respectfully submitted,

/s/ Thomas M. Sobol

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**CERTIFICATE OF SERVICE**

I, Thomas M. Sobol, certify that, on this date, the foregoing document was filed electronically via the Court's CM/ECF system, which will send notice of the filing to all counsel of record, and parties may access the filing through the Court's system.

Dated: April 22, 2022

/s/ Thomas M. Sobol

Thomas M. Sobol